

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**RETIREE COMMITTEE'S JOINDER IN CITY OF DETROIT'S
MOTION FOR ENTRY OF A PROTECTIVE ORDER**

The Official Committee of Retirees of the City of Detroit, Michigan (the "Committee"), by and through its undersigned counsel, hereby joins in the City of Detroit's Motion for Entry of a Protective Order Striking Syncora's Demand in Its Rule 30(b)(6) Deposition Notice for the Personal Financial Information of All City Retirees (Doc. 5442) (the "City's Objection").

The retirees' privacy rights in their personal financial information would be violated by Syncora's deposition topic No. 29. Personal financial information generally is considered private and off-limits to discovery. "Personal financial information, such as one's income or bank account balance, is universally presumed to be private, not public." *In re Boston Herald, Inc.*, 321 F.3d 174, 190 (1st Cir. 2003).

The size of the retirees' claim is what is relevant here—not the financial circumstances of the more than 30,000 retirees, surviving spouses, families and their dependents. If discovery of the individual financial circumstances of the retirees were somehow relevant to this case, then so too would be the financial condition of the individual and institutional Syncora bondholders and insurers. There are enough issues to pursue in discovery in this case without needing to waste time and resources on this kind of fishing expedition.

The Committee agrees with and supports the City's Objection. In joining the City's Objection, the Committee endorses the arguments advanced therein and incorporates them here.

WHEREFORE, the Committee respectfully joins in the City's motion for entry of a protective order striking Syncora's deposition topic No. 29 and for such further relief as the Court deems just and equitable.

Dated: June 20, 2014

Respectfully submitted,

By: /s/ Sam Alberts

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CERTIFICATE OF SERVICE

I, Sam Alberts, hereby certify that the foregoing document was filed and served via the Court's electronic case filing and noticing system on June 20, 2014.

By: /s/ Sam Alberts
Sam Alberts